IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY

Master File No. 2:12-MD-02327 MDL 2327

LITIGATION

ETHICON WAVE 13 CASES LISTED IN EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF JAIME L. SEPULVEDA-TORO, M.D. FOR WAVE 13

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply brief filed in relation to Jaime L. Sepulveda-Toro for Ethicon Wave 1, Dkt. 2014 (motion), Dkt. 2018 (memorandum in support) and Dkt. 2225 (reply). Plaintiffs respectfully request that the Court exclude Jaime L. Sepulveda-Toro's testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the following Wave 13 cases identified in Exhibit A attached hereto.

Dated: December 12, 2019 Respectfully submitted,

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EXHIBIT A

Batson, Deborah G.	14cv06455
Haselden, Sarah	15cv05858
Labiche, Tammie & Mitchell	12cv06198
Poole, Cheryl & Kenneth	12cv01978
Sutton, Cassandra & Robert	13cv16175
Torres, Eda & Alberto	16cv01835

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett_____

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